

TROY LAW, PLLC  
John Troy (JT 0481)  
41-25 Kissena Boulevard Suite 119  
Flushing, NY 11355  
Tel: (718) 762-1324  
*Attorney for the Plaintiff, proposed FLSA Collective and  
potential Rule 23 Class*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

-----X

LIYOU XING,  
*on their own behalf and on behalf of others similarly  
situated, and*

Plaintiffs,  
v.

**Case No. 18-cv-06616**

MAYFLOWER INTERNATIONAL HOTEL GROUP  
INC

d/b/a Mayflower Hotel and  
d/b/a Wyndham Garden;

MAYFLOWER BUSINESS GROUP, LLC

d/b/a Mayflower Hotel and  
d/b/a Wyndham Garden;

MAYFLOWER INN CORPORATION

d/b/a Mayflower Hotel and  
d/b/a Wyndham Garden;

MAYFLOWER WENYU LLC

d/b/a Mayflower Hotel and  
d/b/a Wyndham Garden;

YAN ZHI HOTEL MANAGEMENT INC.

d/b/a Mayflower Hotel and  
d/b/a Wyndham Garden;

MAYFLOWER 1-1 LLC

d/b/a Mayflower Hotel and  
d/b/a Wyndham Garden;

YUEHUA HU,

WEI HONG HU a/k/a Weihong Hu, and

XIAOZHUANG GE

Defendants.

-----X

**29 U.S.C. § 216(b)**  
**COLLECTIVE ACTION &**  
**FED. R. CIV. P. 23 CLASS**  
**ACTION**

**AFFIDAVIT OF  
ZHONGCHENG WANG IN  
SUPPORT OF PLAINTIFF'S  
MOTION FOR  
CONDITIONAL  
COLLECTIVE  
CERTIFICATION**

I, Zhongcheng Wang, being duly sworn and under penalty of perjury, deposes and states as  
follows:

1. I am a resident of Queens, New York, and I am over 18 years of age.
2. I have personal knowledge of the matters stated below.
3. From on or about September 11, 2018 to October 26, 2018, I worked as a cleaner employed by Defendants to work at the Mayflower Hotel at 61-27 186th Street, Fresh Meadows, NY 11365.
4. From on or about September 11, 2018 to October 26, 2018, my regular work schedule ran from 09:00 to 18:00 with one (1) hour meal break for eight (8) hours a day for a total of 40 hours each week.
5. From on or about September 11, 2018 to October 26, 2018, I was paid a flat compensation at a rate of twelve dollars (\$13.00) per hour.
6. At all relevant times, I was never informed of his hourly pay rate or any tip deductions toward the minimum wage.
7. Throughout my employment, I was not given a statement with his weekly payment reflecting employee's name, employer's name, employer's address and telephone number, employee's rate or rates of pay, any deductions made from employee's wages, any allowances claimed as part of the minimum wage, and the employee's gross and net wages for each pay day in Chinese, my native language.
8. I know that it is Defendants' policy to not pay any employee at time and a half rate for all of their overtime hours. I know this because I have talked with other employees, who has the same or similar working schedule as me, and was told that they were also not paid for the total amount of time they have worked, nor compensated for all of their overtime hours worked.
9. During my employment I befriended some of the co-workers who worked for Defendant suffered same practice and policy.

10. I know a co-worker who worked as cleaner the Wyndham Garden Hotel at 61-27 186th Street, Fresh Meadows, NY 11365. His last name is Gao.
11. Gao is about sixty years old and around 1.67 meters' height. He told me he came from Hebei Province, China.
12. Gao started working for the Defendants from on and about February 2018, terminated on or about October 26, 2018.
13. During his employment, Gao's working schedule ran from 7:30 to 16:30 with one-hour break from 12:00-13:00 for 6.5 days a week. Throughout his employment with the Defendants he worked around 52 hours a week.
14. I know Gao's schedule because we worked together every day during his employment.
15. I know Gao was paid at the rate of \$13 dollars per hours.
16. I know this because Gao told me that when we have a dinner together during his employment.
17. I know another co-worker who worked as cleaner the Wyndham Garden Hotel at 61-27 186th Street, Fresh Meadows, NY 11365. His last name is Liu.
18. Liu is about sixty years old and around 1.60 meters' height. He told me he came from Hubei Province, China.
19. Liu started working for the Defendants from on and about February 2018, terminated on or about October 26, 2018.
20. During his employment, Liu's working schedule ran from 7:30 to 16:30 with one-hour break from 12:00-13:00 for 6.5 days a week. Throughout his employment with the Defendants he worked around 52 hours a week.
21. I know Liu's schedule because we worked together every day during his employment.
22. I know Liu was paid at the rate of \$13 dollars per hours.
23. I know this because Gao also told me that when we have a dinner together during his employment.
24. I sincerely believe there are other employees who are also other employees paid less and are not paid for all the hours they worked for the Defendants.

25. I sincerely hope that this Court allows me to represent the interest of my co-workers in this action. These Defendants exploited me and my co-workers, and it is my hope that we will be permitted to recover wages that we are owed.

26. This has been translated into my native language of Chinese and I understand the contents.

Dated: 03/14/2019

Flushing, NY

Wang Zhong Cheng  
Wang, Zhong Cheng

Sworn to me this 14 day of March, 20 19

[Signature]  
Notary Public

AARON B. SCHWEITZER  
Notary Public, State of New York  
No. 02SC6380865  
Qualified in Nassau County  
Commission Expires Sept. 17 2022